

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

JAMIEE L. DESIMONE,

Debtor

Case 20-20487-GLT
Chapter 13

RONDA J. WINNECOUR, TRUSTEE

Movant

Related Doc: 167
Hrg: 3/26/2025, 10AM

v.

JAMIEE L. DESIMONE,

Respondent

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW comes Jamiee L. Desimone, Chapter 13 Debtor, by and through her counsel, Christian M. Rieger, Esquire, and files the following reply to Movant's request for dismissal of the Chapter 13 case, and responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part. Debtor was on unemployment compensation last fall, but

has resumed full time employment effective March 2025. She has sent in one partial payment via TFS in the amount of \$4,000.00 which has not yet posted.

5. Denied. Once the recent payment by Debtor posts, only \$5,760.00 will be required for successful completion. Moreover, Debtor's plan provided for the cure of mortgage arrears, but the ongoing principal and interest payment to be paid by the non-filing spouse. As such, there is no long-term debt in this case.

6. Admitted.

7. Admitted. By way of further response, Debtor shall remit sufficient funds to complete the plan successfully.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's request for dismissal.

Respectfully submitted,

/s/ Christian M. Rieger
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